

May 24, 2017

Chairman Ajit Pai Commissioner Mignon Clyburn Commissioner Michael O'Reilly Federal Communications Commission 445 12th St., S.W. Washington, DC 20554

GN Docket No. 16-46: Comment and data on actions to accelerate adoption and accessibility of broadband-enabled health care solutions and advanced technologies

Dear Chairman Pai and Commissioners:

Idaho Primary Care Association (IPCA) is pleased to provide comments on behalf of our members, Idaho's sixteen non-profit Federally Qualified Community Health Centers (FQHCs).

Community health centers are located in underserved and low-income urban and rural areas and must provide a broad range of comprehensive primary and preventive health care services. Providing care to individuals and families across our expansive state requires reliable and accessible broadband service.

Community health centers have an established record of improving health outcomes and lowering costs for the nation's overall health system.

In 2016, Idaho's 16 health center organizations

- Served more than 170,000 people
- Provided health care to nearly 1 in 10 Idahoans
- Had a statewide reach of 72 clinic sites in 50 communities
- Provided primary care services on a sliding fee
- Delivered primary medical, dental and behavioral health to Idahoans, including
 - 41,247 children (age 18 and under)
 - 5,431 veterans (2015 data)

We urge the FCC to consider the following steps to continue full funding now and to modernize the program in the future. They include:

- 2016 funding Allocate additional funds to support full grant awards for the current fiscal year.
- 2017 funding Allocate additional funds to support full grant awards. We Support the request for additional funding to support use of this program.
- RHC modernization Undertake a modernization program that could include components of the E-rate program that include inflation proofing and authorization to allocate carry-over funds to future years.
- RHC reform Consider changes to the program that could designate some funds for frontier communities for whom access to dedicated internet service is extremely expensive and difficult.

Broadband capacity is essential for health care access in rural Idaho, and in many other states across the nation. Broadband access enables rural providers to:

- Transfer large Electronic Health Records (EHR)
- Provide telehealth services
- Monitor and develop assistive technologies
- ➤ Keep pace with emerging health technologies

The Rural Health Care program was included as a part of the Universal Services Fund (USF) to provide up to \$400 million annually to rural health care providers for telecommunications and broadband services to provide telehealth and telemedicine.

Use of the funds has been limited, yet the need for this type of investment continues to grow. Access to health care in rural Idaho is challenging due to policy decisions on the state level and an environment of uncertainty on the national level. The \$400 million funding should be allocated to providers to strengthen the infrastructure for rural health care. In an environment where there is clear need for these funds, if the money is not being utilized there is a problem.

We deeply appreciate the opportunity to comment and encourage the commission to pursue solutions that will provide the broadband infrastructure needed for a strong health care system in our state, as well as the nation. We urge you to take steps to ensure the viability of the Rural Health Care Program.

Respectfully,

Yvonne Ketchum-Ward, CEO Idaho Primary Care Association

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